

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SES GROUP, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. _____
	)	
LIBERTY MUTUAL INSURANCE	)	
COMPANY,	)	
	)	
Defendant.	)	

**DEFENDANT’S CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATION DISCLOSURE STATEMENT**

COMES NOW, Defendant Liberty Mutual Insurance Company (“Defendant”), by and through its undersigned counsel, and pursuant to Rule 7.1(a)(1) of the Federal Rules of Civil Procedure and Local Rule 3.3, files this Certificate of Interested Persons and Corporate Disclosure Statement, respectfully showing this Court as follows:

(1) The undersigned counsel of record for Defendant certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of the party:

Liberty Mutual Insurance Company (Defendant); Liberty Mutual Group, Inc. is the parent corporation of Defendant, no publicly held corporation owns 10% or more of the stock of Defendant.

SES Group, Inc. (Plaintiff)

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporation having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

Liberty Mutual Insurance Company

SES Group, Inc.

BM&K Construction, Inc.

Quality Steel & Welding, Inc.

City of Brookhaven

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

Kevin H. Hudson, Defendant's Counsel

Alexander J. Bell, Defendant's Counsel

Cory L. Takeuchi, Defendant's Counsel

Benjamin M. Rachelson, Plaintiff's Counsel

Samuel Richards, Plaintiff's Counsel

(4) The undersigned further certifies that the following is a full and complete list of the citizenship of every entity whose citizenship is attributed to a party on whose behalf this certificate is filed:

Liberty Mutual Insurance Company – Massachusetts

SES Group, Inc. – Georgia

Respectfully submitted this 14<sup>th</sup> day of February, 2023.

**HUDSON LAMBERT  
PARROTT WALKER, LLC**

/s/ Kevin H. Hudson

Kevin H. Hudson  
Georgia Bar No. 374630  
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*Counsel for Liberty Mutual  
Insurance Company*

**LR 7.1 CERTIFICATE**

Pursuant to L.R. 7.1D, counsel certifies that the foregoing document complies with the font and point selections approved by the Court in L.R. 5.1C. This document was prepared using Times New Roman 14-point font.

This 14<sup>th</sup> day of February, 2023.

**HUDSON LAMBERT  
PARROTT WALKER, LLC**

/s/ Kevin H. Hudson

Kevin H. Hudson

Georgia Bar No. 374630

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed a copy of the within and foregoing using the Court's CM/ECF System which will automatically send email notification of such filing to all counsel of records as follows and via electronic mail with adequate postage:

Benjamin M. Rachelson  
Samuel Richards  
**Adams and Reese LLP**  
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This 14<sup>th</sup> day of February, 2023.

**HUDSON LAMBERT  
PARROTT WALKER, LLC**

/s/ Kevin H. Hudson

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*Counsel for Liberty Mutual  
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